Neill E. Brower Direct: (310) 712-6833 Fax: (310) 712-8564 NB4@jmbm.com

1900 Avenue of the Stars, 7th Floor Los Angeles, California 90067-4308 (310) 203-8080 (310) 203-0567 Fax www.jmbm.com

Ref: 58038-0043

August 16, 2010

## **VIA EMAIL AND U.S. MAIL**

Kelly Manheimer
Site Manager, San Fernando Valley Superfund Site,
North Hollywood Operable Unit
Mail Code SFD71
75 Hawthorne Street
San Francisco, CA 94105

Re:

Freedom of Information Act ("FOIA") Request:

Correspondence with Los Angeles By-Products Company regarding the San Fernando Valley Superfund Site, North Hollywood Operable Unit ("NHOU")

Dear Ms. Manheimer:

On behalf of our client CalMat Co. dba Vulcan Materials Company, Western Division ("CalMat"), and pursuant to the Freedom of Information Act ("FOIA")(5 U.S.C. § 552, et seq.), we request copies of all non-privileged public records within the possession and/or control of the Environmental Protection Agency ("EPA") in connection with the NHOU concerning or referencing the following:

- Any request for information submitted to Los Angeles By-Products Company at 4050
  Katella Avenue, Los Alamitos, CA 90720 (or any other address) by the EPA or the Los
  Angeles Regional Water Quality Control Board ("LARWQCB") pursuant to § 104(e) of
  CERCLA;
- Any response from Los Angeles By-Products Company or its representative in response to any CERCLA § 104(e) request for information issued by the EPA or the LARWQCB;
- Any and all other non-privileged information regarding the activities of Los Angeles By-Products Company within the NHOU;
- Any and all documents provided by Los Angeles By-Products Company regarding operations or contamination within the NHOU;

Kelly Manheimer August 16, 2010 Page 2

- Any and all information provided by or on behalf of Honeywell Int'l Inc. ("Honeywell")
  regarding the claim that additional potentially responsible parties ("PRPs") exist for the
  NHOU;
- Any and all information provided by or on behalf of Honeywell regarding additional PRPs for contamination in the NHOU; and
- Any and all information provided by or on behalf of any third parties regarding additional PRPs for contamination in the NHOU.

We look forward to your response. Please contact our office with any questions or concerns.

Very Truly Yours,

Neill E. Brower of

Jeffer Mangels Butler & Mitchell LLP

NEB:neb